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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PHILIP J. FAGAN, JR., an individual,
and as Trustee of the PHILIP J.
FAGAN, JR. 2001 TRUST
Plaintiff,

v.

FIRST AMERICAN TITLE INSURANCE
COMPANY; and Does I-X, inclusive,
Defendants

Case No.: 2:23-cv-00371-RFB-DJA

**STIPULATION & ORDER TO
EXTEND TIME TO FILE
OPPOSITION TO MOTION TO STAY
DISCOVERY [DKT. NO 12]
(FIRST REQUEST)**

Plaintiff, Philip J. Fagan, Jr., individually and as trustee of the Philip J. Fagan, Jr. 2001 Trust, ("Plaintiff") and Defendant, First American Title Insurance Company ("Defendant") (collectively, the "Parties"), by and through their respective attorneys of record, hereby stipulate and agree as follows:

1. On March 15, 2023, Plaintiff served Defendant with the Summons and Complaint.
2. On April 13, 2023, Defendant filed a Motion to Dismiss asserting, *inter alia*, the application of the litigation privilege and the Rooker-Feldman abstention doctrine, Docket Entry No. 9.
3. Defendant later filed a Motion to Stay Discovery pending the outcome of the

1 motion to dismiss, Docket Entry No. 12.

2 4. Plaintiff requests a brief extension of time to respond to the Motion to Stay.

3 5. This extension is requested to allow counsel for Plaintiff additional time to review
4 the points and authorities contained in the motion and to provide a detailed response, Plaintiff's
5 office is currently engaged in a 3-week Jury Trial which has limited the time available to fully
6 research the points raised by Defendant. Similarly, Plaintiff and Defendant stipulated to extend
7 the deadline to respond to the Motion to Dismiss by one week, and the briefing on the two motions
8 will be similar, if not virtually identical, as the Motion to Stay is based upon the merits of the
9 motion to dismiss.

10 6. Accordingly, Plaintiff requests a brief extension through May 5, 2023, to respond
11 to the Motion to Stay.

12 7. Counsel for Defendant does not oppose the requested extension.

13 8. This is the first request for an extension which is brought in good faith and not for
14 purposes of delay.

15 DATED this 28th day of April, 2023.

DATED this 28th day of April, 2023.

16 **MAURICE WOOD**

BLACK & WADHAMS

17
18 By: /s/ Brittany Wood

By: /s/ Allison R. Schmidt

19 AARON R. MAURICE, ESQ.

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Attorneys for Defendant

25 IT IS SO ORDERED.

26 
DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

27 DATED: May 1, 2023